

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

October 06, 2022

Nathan Ochsner, Clerk of Court

UNITED STATES OF AMERICA

V.

HERIBERTO LATIGO,
MARIA D. LUCIO DE LATIGO, and
QIJUN SONG,
Defendants.

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CRIMINAL NO. 4:21-CR-575S

SUPERSEDING CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Stalking)

On or about April 1, 2018, through July 29, 2021, in the Southern District of Texas and elsewhere,

**HERIBERTO LATIGO,
MARIA D. LUCIO DE LATIGO, and
QIJUN SONG,**

the defendants, with the intent to injure, harass, intimidate, and place under surveillance with intent to injure, harass, and intimidate another person, did use the mail, an interactive computer service and electronic communication service and electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to an intimate partner of that person, to wit: LATIGO, LUCIO DE LATIGO and SONG used interstate facilities, namely the mail and the Internet, to disseminate harassing and

threatening messages/images regarding Victim-1, causing substantial emotional distress to Victim-

1.

All in violation of Title 18, United States Code, Sections 2261A(2)(B), 2265A, and 2.

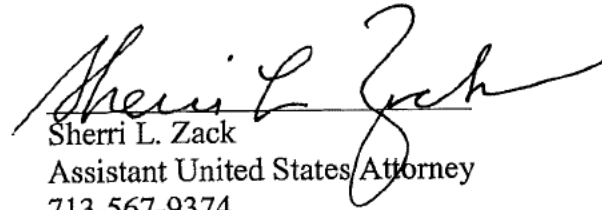
A TRUE BILL:

Original Signature on File

GRAND JURY FOREPERSON

JENNIFER B. LOWERY
Acting United States Attorney

By:


Sherri L. Zack
Assistant United States Attorney
713-567-9374